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5 Attorneys for Defendants
Unifund CCR Partners;
6 Unifund Portfolio A, LLC;
Matthew W. Quall;
7 Lang, Richert & Patch, A Professional Corporation

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9 UNITED STATE DISTRICT COURT OF ALIFORNIA
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 JAGDEEP S BIDWAL,

13 Plaintiff,

14 vs.

15 UNIFUND CCR PARTNERS;
UNIFUND PORTFOLIO A, LLC;
16 MATTHEW W. QUALL; LANG,
RICHERT & PATCH, A
17 PROFESSIONAL
CORPORATION; ELECTRONIC
18 DOCUMENT PROCESSING ING.; J.
ASCORRA; J. WILLIAMS,

19 Defendants.
20

Case No. 3:17-cv-02699-LB

**DECLARATION OF STEPHEN H.
TURNER IN OPPOSITION TO
MOTION FOR AWARD OF
ATTORNEY'S FEES AND COSTS**

Date: March 7, 2019
Time: 9:30 a.m.
Courtroom: C

Honorable Laurel Beeler

21
22 I, Stephen H. Turner, declare as follows:

23 1. I am an attorney duly licensed to practice in this district court and
24 before all courts of the State of California. I am a partner in Lewis Brisbois Bisgaard
25 & Smith. I serve as the chair of the firm's Consumer Litigation Defense & Financial
26 Services Practice group. I make this declaration in support of Defendants'
27 Opposition to Plaintiff's Motion For Attorneys' Fees. I have personal knowledge
28 of the facts set forth below, and if called as a witness, I could and would testify

1 competently thereto.

2 2. I graduated from the University of Southern California School of Law
3 in 1976, and I have been practicing law in California for the past thirty-nine (39)
4 years. During the past 20 years of my career, I have practiced regularly and very
5 extensively in the defense of financial institutions and professionals, including
6 collection agencies, credit grantors, and debt collection law firms, in actions
7 involving claims of unlawful collection practices, intentional misconduct, violations
8 of the Telephone Consumer Protection Act (TCPA), the Fair Debt Collection
9 Practices Act (FDCPA), the Fair Credit Reporting Act (FCRA), the Rosenthal Act
10 and unfair competition statutes. I have defended thousands of these cases filed in all
11 of the courts in California, including this Court, as well as in other jurisdictions
12 across the country, representing debt collectors who have been sued for allegedly
13 violating consumer protection laws.

14 3. I regularly lecture at collection industry conferences and I publish
15 articles on the area of collection law and more specifically, relating to compliance
16 with Federal and state laws and regulations that address debt collection and credit
17 reporting. I have been selected by the national trade organization, American
18 Collectors Association (ACA), to provide assistance to debt collectors regarding
19 collection activity in California and compliance with state and federal laws.

20 4. I regularly handle cases asserting claims under the FDCPA and under
21 the California Rosenthal Fair Debt Collection Practices Act filed in the Northern
22 District of California. I bill my clients no more than \$425.00 hour for my time for
23 these matters. I routinely bill less. I believe \$425.00 is a reasonable rate for
24 attorneys with my level of experience to charge to charge to handle FDCPA matters
25 in the Northern District of California.

26 5. I have reviewed the pleadings in this case that were filed by counsel for
27 plaintiff, and the procedural chronology of the case. My review indicates that the
28 legal services provided and the legal issues addressed in the case were not

1 substantively or procedurally complex. Based on my experience and personal
2 knowledge, I believe that most if not all of my clients would be unwilling to pay
3 more than \$375.00 per hour for my legal services, or for the legal services provided
4 by plaintiff's counsel in this case.

5 6. I believe the hourly rates sought by counsel for plaintiff are excessive
6 for this case and the services provided. Based upon my experience, the hourly rates
7 sought are clearly not within the reasonable range of market rates charged by private
8 attorneys of similar skill, reputation, and experience for comparable legal services in
9 the Northern District of California. In my opinion, the reasonable hourly market rate
10 based on the experience of counsel for plaintiff and the legal services provided
11 would be no more than \$425.00 per hour.

12 I declare under penalty of perjury that the foregoing is true and correct.
13 Executed this 12th day of February, 2019, at New York City, New York.

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16 
17 Stephen H. Turner
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